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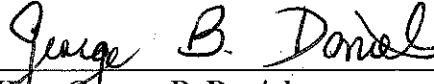
Rachel Perillo

June 30, 2025

**By ECF**

The Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**SO ORDERED.**

  
Hon. George B. Daniels  
June 30, 2025

Re: United States v. Freddy Abad  
01 Cr. 381 (GBD)

Dear Judge Daniels:

I am the attorney for Freddy Abad, the defendant in the above-named matter. Pursuant to the Court's Order dated May 15, 2025, Mr. Abad's supplemental compassionate release motion is due on July 1, 2025 with the government's response due on August 1, 2025. This letter is respectfully submitted without objection from the government, by AUSA Matthew Shahabian, to request a 60-day extension of the current motion deadlines. An extension is needed because we are still in the process of obtaining documents and records needed for our motion, and once our motion is finalized, additional time will be needed to meet with Mr. Abad, who is incarcerated at FCI Fairton in Fairton, New Jersey, to review the motion with him prior to filing. An extension of sixty days should provide sufficient time to do so.

If the Court has any questions regarding this matter, please do not hesitate to contact me.

Respectfully submitted,

/s/

David Stern

cc: AUSA Matthew Shahabian (by ECF)